

EXHIBIT 21

MEMORANDUM

W. R. Starkey

DATE
August 23, 1976FROM
A. T. Curley *ATC*SUBJECT
Waste Chemical Disposal

cc: C. A. Aldag
W. Hobokan
C. E. Kwartler
J. Minott
J. Sigan
H. E. Sullivan

Following is an attempt to update all concerned on the status of the disposal of our waste chemicals. Since Kin-Buc (Gaess) was closed first to our spent acid and finally to all chemical wastes, we have been struggling to dispose of our wastes in a proper manner. After seeing our CDN unit shut down while we sought a home for our spent acid, we began using A.B.M. Disposal for our acid, while Gaess continued to take our other water wastes (not for the landfill).

Over the past few weeks I have had contacts with (1) A.B.M.'s Tieson and Barnhurst (2) Gaess' Santoro and (3) Gaess' ex-salesman John Leuzarder who is now part of a group who have formed Envirotech, a broker for waste disposal. Taking these singly, then:

- (1) A.B.M. has done little to bolster our confidence. Although their price is low, \$1,100 per load, I feel very uncomfortable having to depend on them. Both Santoro and Leuzarder have discovered that we are using A.B.M. and (as would be expected under the circumstances since both are actively seeking our acid business) have stated that A.B.M. is bad news and strongly questioned the legality of their methods. Santoro claims A.B.M. is storing the acid in a 30,000 gallon tank and looking all over the place (including Gaess) to dispose of the acid. What we have observed at our Plant and noted in our contacts with A.B.M. is conflicting. They have been dependable and some of their rigs are in excellent condition. However, some of the rigs are in poor shape. Their drivers seem poorly trained for handling truck loads of acid and initially had little feel for the safe handling of this material including little or no equipment. Efforts to get information on the ultimate destination of these loads have been evaded by Barnhouse and Tieson. We have not been able to get an invitation to inspect their facility.
- (2) Gaess' Santoro is strongly after our spent acid business. They recently took a test load. He visited the plant this past Thursday with the results of that test. He started off by (and this has been his tack on other occasions) hinting that the EPA, and presumably the NJDEP, are ready to seek out the illegal disposers they know are active in the absence of Kin-Buc and the generators who are using these "lizards" as he called them. He said he knows some big companies with their necks stuck out far and that they are going to get it. He wants us to avoid that pitfall.

EXHIBIT

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Being the good salesman that he is, he then went into his pitch. He said the test load went well and that they have a secret process which will dispose of the acid in a completely legal manner with no environmental problems. The "they" in this case may be Modern Transportation in Kearny with whom they have been working since the close of Kin-Buc. Incidentally, I asked about the future

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of Kin-Buc since the newspaper reports of late seem to indicate very little chance for the new Kin-Buc II ever getting NJ-DEP approval. Santoro stated his doubts also and said for this reason Gaess was shifting in other directions, i.e. working with outfits like Modern and Chemical Recovery who have facilities for neutralization, barging, incinerating and sewerage materials.

Santoro indicated the cost would still be in the \$2,000 per load range. He further said they would need a commitment from Ashland since they need a capital investment of \$50,000 to get into operation on a plant scale. Presumably he is looking for a long range contract of some sort. I told him we were interested in settling our spent acid disposal problem but that the price was high. I also said we certainly would want to check out his system before any commitment was made. He countered by emphasizing the secret process and the possibility of our signing a secrecy agreement. He awaits an answer from us.

- (3) I have been working with Leuzarder since he first came to the plant as a Gaess salesman a year ago. He has been very good to us, given us excellent service, has dealt completely above board and appears to be sincere in his efforts to handle wastes properly. Before Gaess let him go, he had expressed his discontent with the way Gaess was dumping thousands of gallons of all types of waste on the landfill with no attempt to "manage, mate, treat or swap wastes". This new group also includes Bob Landmesser who is also an ex-Gaess employee. Bob is also a very pleasant fellow. The point I am attempting to make is that I certainly know a lot more about them than I do about Tieson, Barnhurst or even Santoro.

Leuzarder and Landmesser are very anxious and enthusiastic about getting their new group off the ground. They say they have been received well by industry and have signed quite a few contracts with waste generating companies. They act as brokers, like Gaess, working with Modern, Chemical Recovery and others. They have quoted us prices and in general their prices are very slightly higher than Gaess. They want our acid account badly. They originally quoted \$1,450 but came down to \$1,275. We used them all this week and as of now I plan to stick with them. We are also switching some of our other wastes to them. Our spent acid is going to DeReal (This spelling could be wrong) in Philadelphia. According to Leuzarder, Ciba-Geigy is also using them for spent acid disposal. Here the acid is neutralized (in vessels) and the salt cake landfilled.

I called John today and asked if I could visit the facility and confirm the fact they are handling our acid in a proper manner. He hesitated a minute and then said the process was secret and that the outfit feared another disposal firm would steal their thunder. I got the impression that Leuzarder himself had not seen the process. Leuzarder called me back an hour or so later and said he could arrange a visit in a "couple weeks". This would give them time to "clean up a bit". He also mentioned the signing of a secrecy agreement.

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Tieson of A.B.M. called this week to see why we were not taking any acid. Dick DeWalk told him that we had another source of disposal. When he asked whether the price was better, Dick told him the major reason was that we had more confidence in the other outfit. Apparently Tieson will be up to see us again.

My feelings at this point lean towards staying with Leuzarder conditional with inspecting his outlet to convince ourselves of its legality. Meanwhile, we will have to hold Gaess at bay for awhile as this may turn out to be our only legal outlet. We can also see what A.B.M. will come back with now that they know we mean business on the legality issue. We certainly do not want to close any doors without good reason at this time.

ATC:aa

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EXHIBIT 22

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 CIVIL ACTION NO.
4 BOARHEAD FARM AGREEMENT 02-CV-3830
5 GROUP, Judge Legrome D. Davis
6 Plaintiff, Oral Deposition of

7 vs. MANFRED T. DE REWAL, SR.

8 ADVANCED ENVIRONMENTAL TECHNOLOGY
9 CORPORATION; ASHLAND CHEMICAL
10 COMPANY; BOARHEAD CORPORATION;
11 CARPENTER TECHNOLOGY CORPORATION;
12 CROWN METRO, INC.; DIAZ CHEMICAL
13 CORPORATION; EMHART INDUSTRIES,
14 INC.; ETCHED CIRCUITS, INC.; FCG,
15 INC.; GLOBE DISPOSAL COMPANY, INC.;
16 GLOBE-WASTECH, INC.; HANDY & HARMAN
17 TUBE COMPANY, INC.; KNOLL, INC.;
18 MERIT METAL PRODUCTS CORPORATION;
19 NOVARTIS CORPORATION; NRM INVESTMENT
20 COMPANY; PLYMOUTH TUBE COMPANY;
21 QUIKLINE DESIGN AND MANUFACTURING
22 COMPANY; RAHNS SPECIALTY METALS,
23 INC.; ROHM & HAAS COMPANY, SIMON
24 WRECKING COMPANY, INC.; TECHALLOY
25 COMPANY, INC.; THOMAS & BETTS
CORPORATION; UNISYS CORPORATION;
UNITED STATES OF AMERICA
DEPARTMENT OF NAVY,
Defendants.

17 * * * * *
18 Friday, May 9, 2003
19 * * * * *

20 Transcript in the above matter taken at
21 the offices of Ballard, Spahr, Andrews & Ingersoll,
22 LLP, 1735 Market Street, 42nd Floor, Philadelphia,
23 Pennsylvania, commencing at 10 o'clock A.M.

24 Certified Shorthand Reporting Services
25 Arranged Through
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2 (Pages 402 to 405)

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1 to decompose whatever we're looking for. It's a
2 standard decomposition, sulfuric acid or nitric acid
3 or a mixture of nitric and hydrochloric acid. You
4 know, if you want to analyze something, you start to
5 dissolve something, usually you start off with nitric
6 hydrochloric. They call it aqua regis. It means it
7 dissolves everything except gold.

8 Q. How often would you use sulfuric acid?

9 A. What.

10 Q. How often would you use sulfuric acid in
11 your lab?

12 A. Oh, I don't know. We would --
13 depending, I think I was separating out a by-product,
14 the platinum group metals, and I was using sulfuric
15 acid there to get in the solution. I was looking for
16 platinum.

17 Q. And when did you do that work?

18 A. Sometime in the '70s. I had some
19 material coming out of California, and they were
20 wondering whether we could recover it.

21 Q. Is it fair to say you did that type of
22 work fairly regularly?

23 A. Yeah. If I'm not fishing, I do.

24 Q. Okay. How about nitric acid, how often
25 did you use nitric acid?

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1 nitric acids that you used in your lab?

2 A. Well, probably I have a container there
3 with lime in it or caustic in it, and you usually,
4 you usually have in your waste solution in a
5 laboratory, you usually have as much caustic as you
6 do acid, so one just neutralizes each other. By the
7 time that container is full, when you test it, it's
8 neutral, you know. It doesn't take much of one or
9 the other to bring it to neutral.

10 Q. What would you do with that container of
11 solution?

12 MR. HARRIS: Objection.

13 A. Probably drop it right down my septic
14 tank.

15 Q. All right. Mr. DeRewal, I'm going to
16 change gears a minute. I want to talk to you a
17 little bit about some of the communications you had
18 with Ashland representatives.

19 Do you recall ever inviting or
20 soliciting anyone from Ashland to dispose of waste at
21 Boarhead Farms?

22 A. As I recall, somebody from Ashland did
23 come to Boarhead Farms, yes.

24 Q. Okay. That's not my question, sir.

25 My question is, did you ever invite or

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1 A. Well, you know, you use it in a
2 laboratory. You're constantly using small quantities
3 of it, you know.

4 Q. Is it fair to say you used nitric acid
5 fairly regularly in the lab?

6 A. I think I usually have a gallon jug of
7 each acid, and I don't know how frequently I buy it,
8 but we keep about a gallon to do -- for experimental
9 use.

10 Q. Where did you purchase the sulfuric and
11 nitric acids that you used do you recall?

12 A. Usually small quantities. I usually buy
13 them from Arthur H. Thomas Company. They were a
14 chemical supplier.

15 Q. Where was Arthur H. Thomas located?

16 A. I don't know. They're over here in
17 Jersey somewhere. They used to be in Philadelphia,
18 and I just call them up, and they UPS it to me.

19 Q. When you were ordering from them, were
20 they in Philadelphia or in New Jersey?

21 A. I believe the last time I ordered
22 something from them, they were over here in New
23 Jersey. They're south of Camden somewhere down
24 there, I forget, down near Vineland somewhere.

25 Q. How did you dispose of the sulfuric and

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1 ask anyone from Ashland to dispose of their waste at
2 your property at Boarhead Farms?

3 A. No.

4 Q. I think you mentioned earlier that the
5 disposal of Ashland's waste was brokered by AETC; is
6 that right?

7 A. Right.

8 Q. And were all of DeRewal's billings for
9 the disposal of Ashland's waste directed to AETC?

10 A. Yes.

11 Q. So it's fair to say that you never
12 billed Ashland directly for the disposal of its
13 waste?

14 A. That's correct.

15 Q. Are you aware of anyone ever telling
16 anyone from Ashland that DeRewal or ECC would dispose
17 of Ashland's waste on your property at Boarhead
18 Farms?

19 A. No, I don't think anyone ever told
20 Ashland's that.

21 Q. Are you aware of anyone that worked for
22 DeRewal or ECC ever telling AETC that Ashland's waste
23 would be disposed of at Boarhead Farms?

24 A. Yes.

25 Q. Who told --

25 (Pages 494 to 497)

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1 A. I told them.
 2 Q. -- AETC that?
 3 A. I told AETC that.
 4 Q. Who did you tell at AETC?
 5 A. I forget the name of the principals,
 6 Lazarus, I forget the name of the principals.
 7 Lazarus, John Lazarus, I believe it was.
 8 Q. Who else was present when you told him
 9 that?
 10 A. Two partners.
 11 Q. Anyone else?
 12 A. I think their attorney Veracci. What's
 13 his name, Veracci?
 14 Q. Let's back up a minute. I want to make
 15 sure we clarify the time frame here.
 16 When you say you told them that
 17 Ashland's waste was going to be disposed of at
 18 Boarhead Farms, were you talking about in relation to
 19 that lawsuit?
 20 A. Yes.
 21 Q. Okay. No, I'm not at that point, Mr.
 22 DeRewal. Let's back up.
 23 At the time when you were doing
 24 business with AETC for the disposal of Ashland's
 25 waste --

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1 A. Right.
 2 Q. -- did you represent to anyone at AETC
 3 that Ashland's wastes were going to be disposed of at
 4 Boarhead Farms?
 5 A. Some of it, yes, to the same -- one or
 6 the other of the two principals. I forget which one.
 7 Q. Is it your recollection that you told
 8 them that from the inception of your business
 9 relationship?
 10 A. Yes, and I know them by sight. I just
 11 don't recognize their names. It's been too long.
 12 Q. Did you confirm that in writing
 13 anywhere?
 14 A. Did I confirm it? No.
 15 Q. Why not?
 16 A. Did I confirm it?
 17 Q. Yes.
 18 A. No. Why would I confirm that?
 19 Q. I'm asking you, did you ever confirm it?
 20 MR. HARRIS: Objection.
 21 A. I said no.
 22 Q. Why not?
 23 A. Why not?
 24 Q. Yes.
 25 A. I don't think I confirmed where I was

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1 disposing of it at anyplace. I don't think so in
 2 writing.
 3 Q. I understand that you didn't. I'm
 4 asking you why you didn't.
 5 A. It wasn't requested. Nobody asked me.
 6 Q. Mr. DeRewal, are you aware that Boarhead
 7 Corporation has been named as a defendant in this
 8 lawsuit?
 9 A. Yes.
 10 Q. To your knowledge, have they been served
 11 with a complaint in this matter?
 12 A. Yes.
 13 Q. Have you consulted any counsel with
 14 regard to this lawsuit on behalf of Boarhead
 15 Corporation?
 16 A. Yes.
 17 Q. Who did you consult with?
 18 A. Bob Shusterman.
 19 Q. Is he representing Boarhead Corporation
 20 in this lawsuit?
 21 A. Not yet.
 22 Q. Do you know whether he intends to?
 23 A. Only if he gets paid. I don't get much
 24 pro bono. I used to tell people that. That's what I
 25 told -- one time I told the U.S. Attorney, that Chuck

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1 Peruto who was doing this pro bono. Nobody believed
 2 me. You know, you got to give me a break sometime.
 3 Q. Okay. Mr. DeRewal, why did you choose
 4 to appear today in the last few days without counsel?
 5 A. Do I need one? If I thought I needed
 6 counsel, I would have one. I don't know why I need
 7 one.
 8 Q. Did you consult Mr. Shusterman or
 9 anybody else before you appeared today?
 10 MR. HARRIS: Objection. I don't
 11 represent the witness, but that
 12 certainly is asking for an
 13 attorney-client privilege conversation.
 14 I don't think it's proper.
 15 MR. DOTO: Asking whether he
 16 consulted with an attorney is a
 17 privileged conversation?
 18 MR. HARRIS: It might be.
 19 MR. DOTO: Fine.
 20 BY MR. DOTO:
 21 Q. You can answer the question.
 22 A. Shusterman said he wasn't invited, and I
 23 said, Well, who is going to invite you? I said, I
 24 can't invite you because you'll send me a bill. I
 25 talked to him last week about this, but Bob

26 (Pages 498 to 501)

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1 present at that trial?
 2 A. No.
 3 Q. Was anybody from --
 4 A. Linda Cochran.
 5 Q. Linda Cochran was at that trial?
 6 A. Right.
 7 Q. Did she testify at that trial?
 8 A. I don't think so. I don't think so. I
 9 think the only people that testified besides myself
 10 were -- John Landmesser is his name. He's one of the
 11 principals.
 12 Q. Is this the name that you couldn't
 13 remember yesterday?
 14 A. Right, isn't it something like that,
 15 Landmesser?
 16 Q. Yes.
 17 A. Okay.
 18 Q. You get a bonus prize.
 19 Why was Linda Cochran present at the
 20 trial when she wasn't testifying?
 21 A. I think she's the one who obtained the
 22 lawyer for the case. I'm sure. I didn't know this
 23 lawyer that represented me. I met him the day of the
 24 trial. I mean --
 25 Q. Was Linda Cochran present for that whole

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1 A. No.
 2 Q. -- a written transcript of that trial?
 3 A. No.
 4 Q. Do you remember if in that lawsuit that
 5 we're talking about, if AETC filed a countersuit, a
 6 counterclaim against DeRewal Chemical?
 7 A. I don't know. I don't know if they did
 8 or not.
 9 Q. I just have a few questions, I want to
 10 change subjects now with respect to the testimony
 11 that you gave this morning to Mr. Doto regarding the
 12 conversation that you had with AETC's principals in
 13 which you related this morning that you told them
 14 that Ashland's waste was going to be disposed of at
 15 the Boarhead Farm site.
 16 Do you remember that testimony?
 17 A. Yes.
 18 Q. Okay. Were one or both of AETC's
 19 principals, Mr. Landmesser and Mr. Lazarus, were they
 20 both present during that conversation?
 21 A. I believe so. It happened at Boarhead.
 22 Q. Okay. Was anybody else present during
 23 that conversation besides you and these other two
 24 gentlemen?
 25 A. Linda Cochran. I think she was there

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1 trial?
 2 A. Yes.
 3 Q. Aside from Mr. Landmesser, was there --
 4 Mr. Landmesser and AETC's lawyer, was there anybody
 5 else from AETC at that trial?
 6 A. There was four other attorneys. I don't
 7 know who they represented. In this case, I don't
 8 know who they represented.
 9 Q. Okay. But my question was, aside from
 10 Mr. Landmesser and AETC's liar, was there anybody
 11 else AETC who was present at that trial?
 12 A. I don't know whether the other partner,
 13 Lazarus is it, was there or not. I don't really
 14 remember, but I know there was some other attorneys
 15 there, and I don't know who they'd be representing.
 16 They weren't representing me, so I don't know what
 17 companies they were representing.
 18 Q. Do you know if a written transcript of
 19 that trial was created?
 20 A. No, I do not know, but I assume it's
 21 not, they have it recorded, don't they?
 22 Q. I'm just asking you if you know as we're
 23 sitting here today.
 24 A. I don't know that.
 25 Q. Have you ever seen --

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1 while we were talking.
 2 Q. Anybody else?
 3 A. There may have been, but I can't recall.
 4 Q. Okay. Was anybody from Ashland
 5 present --
 6 A. No.
 7 Q. -- during that conversation?
 8 A. No.
 9 Q. Was anybody from Diaz Chemical present?
 10 A. No.
 11 Q. All right. I just want you to take a
 12 look at the date on P-47, which is the invoices.
 13 I'll help you out here. It's the invoices to AETC,
 14 and it's March and April of 1977.
 15 A. Okay.
 16 Q. Do you see those dates?
 17 A. Uh-huh.
 18 Q. March and April of '77.
 19 Did this conversation at the Boarhead
 20 Farms when Mr. Landmesser and Mr. Lazarus and Linda
 21 Cochran was present when you said where Ashland's
 22 waste was going to be disposed of, did it happen
 23 before those dates in those invoices?
 24 A. I can only guess that --
 25 Q. That's fine.

34 (Pages 530 to 533)

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1 A. I can only guess. It was warm.
2 Q. It was warm?
3 A. Oh, it happened after this.
4 Q. Okay. Thanks.
5 A. Because Mr. Lazarus had brought a rifle
6 which he wanted to zero in on the property.
7 Q. Okay. Thank you very much. I have no
8 further questions?
9 A. All I recall, he had a contest with
10 Linda Cochran, and she was the better shot.
11 (CONTINUED EXAMINATION OF MR. DE REWAL, SR. BY MR.
12 HARRIS:)
13 Q. The conversation you were just asked
14 about with Landmesser and Lazarus or whatever his
15 name is, did DeRewal Chemical continue to take
16 Ashland's waste after that conversation took place?
17 A. Oh, yes.
18 Q. All right. I don't have anything
19 further?
20 MR. SABINO: Thank you.
21 (Testimony concluded.)
22
23
24
25

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1 CERTIFICATE
2 I, NORA M. GALLAGHER, a Notary Public and
3 Certified Shorthand Reporter of the State of New
4 Jersey, and Commissioner of Deeds of the Commonwealth
5 of Pennsylvania, do hereby certify that prior to the
6 commencement of the examination,
7 MANFRED T. DE REWAL, SR.
8 Was duly sworn by me to testify to the truth, the
9 whole truth and nothing but the truth.
10 I do further certify that the foregoing
11 is a true and accurate transcript of the testimony as
12 taken stenographically by and before me at the time,
13 place and on the date hereinbefore set forth.
14 I do further certify that I am neither
15 a relative nor employee nor attorney nor counsel of
16 any of the parties to this action, and that I am
17 neither a relative nor employee of such attorney or
18 counsel and that I am not financially interested in
19 this action.
20
21
22 Nora M. Gallagher, C.S.R.
23 My Commission Expires October 24, 2007
24 Certificate No. XI00911
25 Date:

35 (Pages 534 to 535)

C E R T I F I C A T E

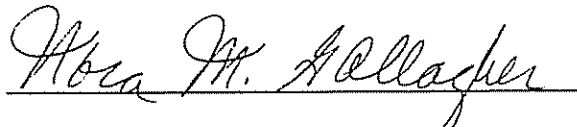
I, NORA M. GALLAGHER, a Notary Public and
Certified Shorthand Reporter of the State of New
Jersey, and Commissioner of Deeds of the Commonwealth
of Pennsylvania, do hereby certify that prior to the
commencement of the examination,

MANFRED T. DE REWAL, SR.

Was duly sworn by me to testify to the truth, the
whole truth and nothing but the truth.

I do further certify that the foregoing
is a true and accurate transcript of the testimony as
taken stenographically by and before me at the time,
place and on the date hereinbefore set forth.

I do further certify that I am neither
a relative nor employee nor attorney nor counsel of
any of the parties to this action, and that I am
neither a relative nor employee of such attorney or
counsel and that I am not financially interested in
this action.



Nora M. Gallagher, C.S.R.
My Commission Expires October 24, 2007
Certificate No. XI00911
Date: 5/16/13

EXHIBIT 23

Linda J. Cochran

May 15, 2003

Page 1

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

----- CIVIL ACTION NO.
BOARHEAD FARM AGREEMENT GROUP, 02-CV-3830
Plaintiff, JUDGE LEGROME D. DAVIS
Deposition of:
LINDA J. COCHRAN
vs.

ADVANCED ENVIRONMENTAL TECHNOLOGY
CORPORATION; ASHLAND CHEMICAL
COMPANY; BOARHEAD CORPORATION;
CARPENTER TECHNOLOGY CORPORATION;
CROWN METRO, INC., DIAZ CHEMICAL
CORPORATION; EMHART INDUSTRIES,
INC.; ETCHED CIRCUITS, INC.;
FCG INC.; GLOBE DISPOSAL COMPANY,
INC., GLOBE-WASTECH, INC.; HANDY &
HARMAN TUBE COMPANY, INC.; KNOLL,
INC.; MERIT METAL PRODUCTS
CORPORATION; NOVARTIS CORPORATION;
NRM INVESTMENT COMPANY; PLYMOUTH
TUBE COMPANY; QUIKLINE DESIGN AND
MANUFACTURING COMPANY; RAHNS SPECIALTY
METALS, INC.; ROHM & HASS COMPANY,
SIMON WRECKING COMPANY, INC.;
TECHALLOY COMPANY, INC.; THOMAS &
BETTS CORPORATION; UNISYS CORPORATION;
UNITED STATES OF AMERICA DEPARTMENT OF NAVY,
Defendants.

ORIGINAL

* * * * *
May 15, 2003
* * * * *

TRANSCRIPT in the above matter taken at the
offices of BALLARD, SPAHR, ANDREWS & INGERSOLL,
ESQUIRES, 1735 Market Street, 42nd Floor,
Philadelphia, Pennsylvania, 19103, commencing at
10:00 a.m.

CERTIFIED SHORTHAND REPORTING SERVICES

Arranged Through

MASTROIANNI & FORMAROLI, INC.

709 White Horse Pike

Audubon, New Jersey 08106

(856) 546-1100

Page 74

1 A. Yes.
 2 Q. Did you ever hear the name of a company
 3 called Advanced Environmental Corporation?
 4 A. Yes.
 5 Q. What circumstances have you heard that
 6 name?
 7 A. It was a company that two guys had over
 8 in New Jersey someplace, I can't remember where, and
 9 I mean they had a company that had to produce waste
 10 or something because Fred did business with them,
 11 they were one of the companies that he did business
 12 with. And the reason I remember them better than any
 13 of the other ones is those two guys came over to the
 14 farm.
 15 Q. Okay. And who did you --
 16 A. A lot of the other companies, I never
 17 saw anything except in an invoice.
 18 Q. Okay.
 19 A. Whereas these two, there were some of
 20 them that came over, but these two guys came over to
 21 the farm.
 22 Q. Okay. You saw them?
 23 A. Yes.
 24 Q. Did you meet them?
 25 A. Yes.

Page 75

1 Q. Do you remember their names?
 2 A. The tall one and the heavy set guy, John
 3 and Bob, and they both had last names with L's, like
 4 Lucwiski (ph), Lasouras (ph), I can't remember the
 5 other one.
 6 Q. On how many occasions did you meet with
 7 either or both of these folks?
 8 A. They both came over to the farm, and I
 9 can only guess it was somewhere around hunting season
 10 because I know we were shooting rifles.
 11 Q. Okay.
 12 A. And that's the only time I really
 13 remember. You know, I don't know whether -- it seems
 14 to me we went out, we went to get something to eat,
 15 but whether it was the same day or whether that was
 16 another time, I'm not really sure.
 17 Q. Okay. You have a specific recollection,
 18 though, of one visit with the two of them?
 19 A. Yes.
 20 Q. And guns?
 21 A. Yes.
 22 Q. Did you observe, the one visit that
 23 we're talking about, did you have occasion to observe
 24 any conversation between the two Advanced
 25 Environmental folks and Fred DeRewal about business?

Page 76

1 A. Yeah, they talked about business. But
 2 again, you know, I wasn't really privy to the
 3 business end of it. I mean, that wasn't -- you know,
 4 just looking at it from a practical standpoint, if
 5 Fred was going to talk to them about hauling waste,
 6 it's not something he'd want to do in front of you or
 7 me or anybody else unless he absolutely had to.
 8 Q. Did you in any of the conversations --
 9 back up. Strike it.
 10 On the occasion when the two people
 11 from Advanced Environmental visited the site, did you
 12 ever hear Mr. DeRewal discuss with them where he was
 13 going to dump any of the waste that they were
 14 associated with?
 15 A. I don't think so.
 16 Q. Would you take a look, please, at a
 17 document that's been previously marked as Exhibit
 18 P-45, and I'm going to ask you if you recognize any
 19 of the handwriting on that document.
 20 MR. DILLON: For the record, can you
 21 state what P-45 is?
 22 MR. HARRIS: It's a handwritten note.
 23 MR. DILLON: That's fine.
 24 THE WITNESS: My guess is that this is
 25 Fred's handwriting.

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1 BY MR. HARRIS:
 2 Q. It's not yours?
 3 A. No.
 4 Q. Okay. Did you ever see any truck, other
 5 than trucks that you believed to be associated with
 6 Fred's business, bring waste to the Boarhead site?
 7 A. The tankers are very hard to tell. But
 8 I mean, I kind of knew the ones that I saw all the
 9 time. There could have been other tankers that were
 10 brought in there. I mean, somebody could have
 11 switched the tanker, taken one of Fred's and brought
 12 another one back, and I'm not so sure I would have
 13 really recognized it. I mean, they were all kind of
 14 the same color and they didn't have big letters on
 15 the side that said DeRewal, other than just me kind
 16 of remembering what they looked like, but they do all
 17 look very much alike. Drums, the only specific time
 18 I remember anybody else's drums or anything coming in
 19 there were from Marvin Jonas.
 20 Q. Tell us what recollections you have
 21 about Marvin Jonas' drums?
 22 A. Marvin is very much the same, I knew who
 23 Marvin was. When he came in, he came in a little bit
 24 before or a little bit after some of the drums and
 25 the truck came in. He didn't stand there and say

20 (Pages 74 to 77)

Linda J. Cochran

May 15, 2003

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1 MR. HARRIS: MR. HARRIS: Thank you for
2 your time today, Ms. Cochran. You're free to leave.

3 May I suggest nobody leave yet so we
4 can talk about a couple of things after the witness
5 leaves.

6 (Deposition Concludes.)
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Page 159

1 CERTIFICATE
2

3 I, LISA MARCUS, a Notary Public, RPR, and
4 Certified Shorthand Reporter of the State of New
5 Jersey, do hereby certify that prior to the
6 commencement of the examination, LINDA COCHRAN, was
7 duly sworn by me to testify the truth, the whole
8 truth, and nothing but the truth.

9 I DO FURTHER CERTIFY that the foregoing is a
10 true and accurate transcript of the testimony as
11 taken stenographically by and before me at the time,
12 place, and on the date hereinbefore set forth, to the
13 best of my ability.

14 I DO FURTHER CERTIFY that I am neither a
15 relative nor employee nor attorney nor counsel of any
16 of the parties to this action, and that I am neither
17 a relative nor employee of such attorney or counsel,
18 and that I am not financially interested in the
19 action.
20
21

LISA MARCUS, C.S.R.

Notary Public, State of New Jersey

My Commission Expires November 17, 2004

Certificate No. XI01492

Date: May 30, 2003
24
25

41 (Pages 158 to 159)

MFCSRS@aol.com

Mastroianni & Formaroli, Inc.
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(856) 546-1100

EXHIBIT 24

ADVANCED ENVIRONMENTAL TECHNOLOGY CORP., INC.
"THE ENVIROTECH CO."

P.O. Box 152 • Milltown, New Jersey 08850 • (201) 238-0020

ORIGINAL
(Red)

September 9, 1976

Mr. Fred DeRewal
DeRewal Chemical Co.
Box 58
Revere, Pa.

Dear Fred,

Confirming ours 9/9/76 - your prices to us -

- 1) Diamond Shamrock - Carlstadt
Still Bottoms 65% H₂O (Ph. 11) 35% dissolved solids
including -
Na₂SO₄ (largest amount)
Naphthalene sulfonated polymers
other sulfonated materials
some diatomaceous earth
small amount CaSO₄
Trace Phenol

Your price to truck/dispose for Envirotech -----8¢/gallon.
(about 5000 gal./week)

- 2) Roche - Belvidere
67-75% H₂O (by wt.)
24-32% sodium sulfate
0.4% Chlorides
0.5% Carbon
(about 2 to 10 loads per week at 5500 gal. each)

Trucks must be clean and neat in appearance.
Roche will be told materials is going to Grows
Landfill (can it - or at least part?) and lime
make-up.

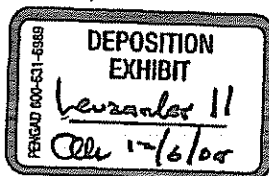
Your price to Envirotech for trucking/disposal -----6¢/gallon.
(5500 gal. minimum load)

No. pumps required on either account.

Sincerely,

John Leuzarder
John Leuzarder
Technical Service Rep.

lauler P.U.C. License # 7011R-61
E.P. # NJBS.W.M. 02456003



BH 000 3463

BSAJ050965

PTT
ORIGINAL
(Red)

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RM 000 3464

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